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Attorneys for PGM OF TEXAS, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PGM OF TEXAS, LLC,

Movant,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:23-cv-00717-APG-DJA

**JOINT STIPULATION TO
CONTINUE PGM OF TEXAS, LLC'S,
REPLY TO GOVERNMENT'S
RESPONSE TO MOTION FOR
RETURN OF PROPERTY**

IT IS HEREBY STIPULATED AND AGREED, by and between Peter S. Christiansen, Esq. and Kendelea L. Works, Esq., of Christiansen Trial Lawyers, counsel for PGM OF TEXAS, LLC, and Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, that PGM's deadline to file its Reply to the Government's Response to PGM's Emergency Motion for Return of Seized Property (ECF No. 1) currently due on Wednesday, May 31, 2023, be continued to Thursday, June 1, 2023.

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1 This stipulation is entered into for the following reasons:

- 2 1. Movant needs an additional day to respond to Government's reply, due to the
- 3 Memorial Day holiday and time constraints associated with other scheduling matters
- 4 and family commitments.
- 5 2. Both Parties agree good cause exists for the requested extension, which is brought in
- 6 good faith and not for the purpose of delay.
- 7 3. This is the first request for continuance of the Movant's current reply deadline (the
- 8 reply deadline was previously extended due to the government's opposition deadline
- 9 being extended two additional days).

10 DATED this 31st day of May, 2023.

11 Respectfully submitted:

12 CHRISTIANSEN TRIAL LAWYERS

13 /s/ Peter S. Christiansen

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15 PETER S. CHRISTIANSEN, ESQ.
16 KENDELEE L. WORKS, ESQ.
17 Attorneys for Movant
PGM OF TEXAS, LLC

UNITED STATES ATTORNEY'S OFFICE

/s/ Edward G. Veronda

JASON M. FRIERSON
United States Attorney
EDWARD G. VERONDA
Assistant United States Attorney



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ORDER

Based on the stipulation of counsel, good cause appearing, and the best interests of justice being served:

IT IS HEREBY ORDERED that PGM's deadline to file its Reply to the Government's Response to PGM's Emergency Motion for Return of Seized Property (ECF No. 1), currently due on Wednesday, May 31, 2023, be continued to Thursday, June 1, 2023.

DATED this 1st day of June 2023.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

